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**STATEMENT OF BASIS
CLARK COUNTY DEPARTMENT OF PUBLIC WORKS FOR
SALMON CREEK WASTEWATER TREATMENT PLANT,
HAZEL DELL SEWER DISTRICT & CITY OF BATTLE GROUND
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0023639**

The purpose of this Statement of Basis is to explain the need to modify the Permit to recognize that factors beyond the reasonable control of the Permittee justify an extension to the date for decommissioning the lagoon and associated tasks such as providing plans and specifications for a new surge basin at that location.

I. GENERAL INFORMATION

Permittee: Clark County Department of Public Works
Salmon Creek Wastewater Treatment Plant
Hazel Dell Sewer District
City of Battle Ground
15100 Northwest McCann Road
Vancouver, WA 98685

B. Discharge Location: Clark County's Salmon Creek Wastewater Treatment Plant
Latitude: 45° 43' 58" N
Longitude: -122° 45' 23" W

II. REQUEST FOR MODIFICATION

On January 22, 2009, the city of Battle Ground (City) requested a permit modification based on new information not available at the time the prior permit was issued. The City would like to have until October 15, 2012, to complete the decommissioning of the City's "lagoon," with a corresponding deadline of October 1, 2011, for development of plans and specifications.

The Permit required the City to complete plans for decommissioning the earthen structure which had previously been the primary treatment component when the City was discharging to a small nearby river. All discharges from this structure to waters of the state halted a number of years ago when the City hooked up, through a force main, to the County's Salmon Creek Wastewater Treatment Plant. The Department of Ecology (Department) has previously referred to the former treatment lagoon as a "side line surge basin" since that best matches its present functional use under the Department's "Criteria for Sewage Works Design." However, since the City refers to this simply as the "lagoon," for sake of clarity, the Department will refer to it as such in this document. This approximately 8 acre "lagoon" is lined with bentonite clay on the bottom and sides, and has a plastic (likely PVC or HDPE) skirt around the perimeter bank.

When the City built a force main and pump station to discharge to the Salmon Creek Wastewater Treatment Plant, they removed the floating aerators from the lagoon, but kept the basin connected to valves that allow it to be filled when storm surge flows exceed the capacity the City has purchased from Clark County, or the capacity of the pump station. The City previously employed

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screening and degritting devices that pretreated wastewater discharged to the lagoon, but these devices are now abandoned, and a comminutor is in use instead (that chops up/macerates solids rather than removing them).

The City is presently working on finalizing plans for construction of a reuse facility. The delays in showing that the application site is feasible have delayed the decision about what future utility the lagoon will have in the treatment scheme. There has been no lack of diligence on the City's part in attempting to resolve site suitability concerns.

Comparison of Modified Permit Limits with the Permit Issued July 1, 2005: Permit limits from the applicable sections of NPDES permit number WA0023639, Section S8 are modified as follows:

- **Section S8.A, date for submitting a General Sewer Plan and Engineering Report changed from November 15, 2007, to November 15, 2010.**
- **Section S8.B, date for providing Plans and Specifications changed from May 15, 2008, to October 1, 2011.**
- **Section S8.D, new section added to recognize the need for the requested final compliance date as October 15, 2012 (as requested).**

Proposed Table of Submittals Changes: The above monitoring table is modified as shown below:

Submittals for the City of Battle Ground:

Permit Section	Submittal	Frequency	First Submittal Date
S8.A	Engineering report for Equalization Lagoon	1/Permit	November 15, <u>2010</u>
S8.B	Engineering Plans and Specs for Equalization Lagoon	1/Permit	<u>October 1, 2011</u>
<u>S8.D</u>	<u>Final Compliance Date for Equalization Lagoon</u>	<u>1/Permit</u>	<u>October 15, 2012</u>

S8. ENGINEERING REPORT FOR BATTLE GROUND

A. Updated General Sewer Plan

An updated General Sewer Plan and Engineering Report shall be submitted for either removal or upgrade of the old sewage lagoon that is presently being used as an equalization basin. If the lagoon is upgraded, the engineering report shall

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include plans for upgrading the facility to meet the criteria of Chapter T1 of the Department's Criteria for Sewage Works Designs. If the General Sewer Plan recommends decommissioning the lagoon, then the Engineering report must include plans for removal of biosolids accumulated within the lagoon and restoration of the land at the lagoon site. Ground water monitoring is also required for continued use of the equalization lagoon as shown in S2 and S11.

No later than **November 15, 2007 2010**, two copies of an approvable Engineering Report as part of an update to the Battle Ground General Sewer Plan, shall be prepared by the Permittee in accordance with WAC 173-240 and submitted to the Department for review and approval.

B. Plans and Specifications

No later than **May 15, 2008, October 1, 2011**, after the approval date of the engineering report, the Permittee shall submit to the Department for review and approval two copies of approvable plans and specifications for either equalization lagoon decommissioning or improvements as described in the approved General Sewer Plan amendment and Engineering Report.

C. Construction Quality Assurance Plan

Prior to the start of construction, the Permittee shall submit to The Department a quality assurance plan as required by WAC 173-240.

D. Full Decommission {NEW SECTION}

The city of Battle Ground shall fully decommission the lagoon by October 15, 2012; or, the City shall meet the requirements of Chapter 173-240 and the Department's "Criteria for Sewage Works Design" for any continued use beyond this date of a more modern facility (side line surge basin) in part or all of the same location.